



0056731

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

02-RCA-0236

MAR 21 2002

RECEIVED
MAR 25 2002
EDMC

Mr. Michael L. Goldstein
Acting Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Mr. Goldstein:

RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) ON THE
DRAFT A, "200-PW-1 PLUTONIUM/ORGANIC-RICH PROCESS
CONDENSATE/PROCESS WASTE GROUP OPERABLE UNIT RI/FS WORK PLAN,"
DOE/RL-2001-01

56419

Please reference EPA letter to B. Foley, U.S. Department of Energy (DOE), Richland Operations Office, from Dennis Faulk, "EPA Comments on 200-PW-1 Plutonium/Organic-Rich Process Condensate/Process Waste Group Operable Unit RI/FS Work Plan," dated February 12, 2002.

Attached are responses to EPA comments on Draft A of the "00-PW-1 Plutonium/Organic-Rich Process Condensate/Process Waste Group Operable Unit RI/FS Work Plan," DOE/RL-2001-01. Two comments that require further discussion pertain to the representative waste site borehole characterization and the RI/FS schedule. At your earliest convenience, DOE would like to discuss these two items. Assuming that we can resolve all of EPA's comments by March 15, 2002, a redline version, incorporating comment disposition, can be completed by April 5, 2002.

DOE suggests that a meeting be scheduled in April with EPA and the State of Washington Department of Ecology to discuss DOE's proposed approach to operable unit consolidation in work plans. Depending on the results of the public review of the proposed Hanford Federal Facility Agreement and Consent Order modifications, a subsequent redline version of the work plan, incorporating the consolidation of the 200-PW-3 and 200-PW-6 operable units, can be completed by April 26, 2002.

MAR 21 2002

Mr. Michael L. Goldstein
02-RCA-0236

-2-

Following EPA agreement to the redlined changes, a final work plan will be issued within 30 days of EPA approval. If you have any questions, please contact Bryan Foley, Waste Management Division, at (509) 376-7087.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:JKY

Attachment:
Responses to EPA Comments on Draft A
200-PW-1 RI/FS Work Plan

cc w/attach:
R. Gay, CTUIR
J. S. Hertz, FHI
A. M. Hopkins, FHI
R. Jim, YN
O. S. Kramer, FHI
T. M. Martin, HAB
E. J. Murphy-Fitch, FHI
K. Niles, Oregon Energy
P. Sobotta, NPT
R. F. Stanley, Ecology
Administrative Record

Responses to EPA Comments on Draft A, 200-PW-1 RI/FS Work Plan

1) Page 3-3, Section 3.3

This section discusses the nature and extent of contamination. Data exists on the contents of tank 241-Z-361; however, the tank characterization is not discussed. Please add a summary of the characterization data for 241-Z-361.

Response: Agree. A summary of characterization data for 241-Z-361 will be added to the discussion.

2) Page 4-4, Section 4.2

There is an extensive amount of data on both the Z-1A and A-9 cribs. EPA would like to discuss the rationale on why DOE believes further information is needed and how that data will assist in the decision process.

Response: Agree. A meeting with EPA will be set-up to discuss the approach to characterization of these sites with EPA.

3) Page 5-10, Section 5.5, 2nd to last sentence

The Proposed Plan will identify the preferred alternative(s) for waste sites **within** the operable unit, not **for** the operable unit.

Response: Agree. The suggested change will be made.

4) Page 5-2, Section 5.2

This section and Section 3.3.6 regarding ecological risk assessment are not consistent. Please provide a status of the current ecological risk efforts and the relationship between the 200 Area-wide effort and 200-PW-1.

Response: Agree. A status of the current ecological risk efforts and the relationship between the 200 Area-wide effort and 200-PW-1 will be added.

5) Page 5-7, Section 5.3.5.3

This section discusses risk assessment. However, from the text it is not clear what tasks are being proposed. Please clarify.

Response: Agree. The text will be clarified.

6) Page 6-8, Section 6-4, 1st bullet

This statement says the network will consist of existing wells. It is EPA's expectation that this activity may indicate a need to add additional wells to the network. The text should be changed to reflect this.

Response: Agree in part. The text will be replaced with text indicating that the monitoring network will be documented in the *Sampling and Analysis Plan for the 200-ZP-1 Groundwater Monitoring Well Network*, DOE/RL-2002-17.

7) Page 7-2, Schedule

EPA has several questions regarding this schedule. In addition, EPA would like to discuss how the approach to add additional operable units into this work plan will occur.

Response: Agree. A meeting with EPA will be set-up to discuss the schedule and the approach to adding additional operable units.

8) Page 8-3, last reference
Change Olympia to Seattle.

Response: Agree. The change will be made.

9) Page A-43, Section A.5
No mention is made regarding a waste control plan. A waste control plan must be in place prior to implementing field work.

Response: Agree. A reference to the waste control plan will be added.